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December 1, 2005

2005-347-1
Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: BellSouth's Comments on Commission's Proposed Changes to Article 6

In compliance with the Notice issued by the Public Service Commission of South Carolina on or about November 8, 2005, BellSouth Telecommunications, Inc. respectfully submits the following comments on the Commission's Proposed Changes to Article 6.

As background, the Office of Regulatory Staff ("ORS") submitted proposed revisions to Article 6 (the "collaborative suggestions") on October 25, 2005. These collaborative suggestions were the result of discussions between representatives of the ORS and various telephone companies, including BellSouth. Some of the collaborative suggestions represent common agreement among the participants in those discussions, while others represent compromises with respect to the positions of the participants in those discussions. BellSouth submits that the collaborative suggestions are a good first step toward updating Article 6 in light of both 2004 Act No. 175 and the ever increasing changes in the competitive marketplace. BellSouth, therefore, believes that the Commission should incorporate all of the collaborative suggestions into its revisions of Article 6, and it has prepared these comments consistent with that belief.

In preparing these Comments, BellSouth has attempted to compare the Commission's proposed revisions to Article 6 with the collaborative suggestions. The two exhibits to this letter reflect that comparison.

BellSouth has no suggested modifications at this time to the Commission's proposed changes to the rules set forth in Attachment A to this letter. BellSouth's initial impression is that the Commission's proposed changes to the rules set forth in Attachment A are conceptually consistent with the collaborative suggestions. BellSouth reserves the right to revise its position on these rules based on any comments or other activities that may take place regarding these rules.

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With regard to the Commission's proposed changes to the rules set forth in Attachment B to this letter, BellSouth stands by the collaborative suggestions and urges the Commission to adopt the collaborative suggestions in total for these rules.

Sincerely,

A handwritten signature in cursive script that reads "Patrick W. Turner". The signature is written in black ink and is positioned above the printed name.

Patrick W. Turner

PWT/nml
Enclosure

**ATTACHMENT A TO BELL SOUTH'S LETTER
DATED DECEMBER 1, 2005**

BellSouth has no suggested changes at this time to the Commission's proposed changes to the rules set forth below. Unless otherwise noted, the Rule Numbers are those that appear in the Commission's proposed changes.

103-600 (Authorization of Rules)
Omission of FCC as a defined term. (Collaborative Proposed 103-602.4).
103-602.2 (definition of Access Line)
103-602.3 (definition of Commission)
103-602.4 (definition of Customer)
103-602.6 (definition of Interexchange Carrier)
103-602.7 (definition of ORS)
103-602.8 (definition of PSP)
103-602.9 (definition of Radio Common and Cellular Carrier)
103-602.10 (definition of Reference)
103-602.11 (definition of Standard Network Interface Device)
103-602.12 (definition of Telephone Utility)
103-603 (Authorization for Rates and Charges)
103-606 (Service Offerings)
Omission of Filing Requirements (Collaborative Proposed 103-607)
103-610 (Location of Records and Reports)
103-611 (Retention of Records)
103-615 (Accidents)
103-616 and all subparts (Complaints Received from the ORS)
103-617 (Tests)
103-619 (Held Applications/Availability of Service)
103-621.2 (Amount of Deposit)
103-621.4 (Deposit Records)
103-621.7 (Deposit Credit)
103-622 (Customer Billing)
103-622.1 and all subparts (Bill Forms)
103-622.2 (Late Payment Charges)
103-622.4 (Payment by Check)
103-622.5 (Deferred Payment Plan)
103-623 (Adjustment of Bills)
103-623.1 (Customer Willfully Overcharged)
103-623.2 (Customer Inadvertently Overcharged)
103-623.3 (Customer Undercharged Due to Willfully Misleading Company)
103-623.4 (Customer Undercharged Due to Human or Machine Error)
103-624.1 (Method)
103-624.3 (Termination)
103-625 (Reasons for Denial or Discontinuance of Service)
103-627 (Rights of Access)
103-628 (Customer Complaints)

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103-630 (System Which Telephone Utility Must Maintain)
103-633 (Procedures for Termination of Service)
103-640 (Requirements for Good Engineering Practice)
103-641 (Acceptable Standards)
103-642 (Acceptable References)
103-643 (Adequacy of Service)
103-645 (Hazardous Locations)
103-646 (Emergency Operation)
103-650 (Utility Inspection and Test)
103-652 (Testing Facilities)
103-654 (Maintenance of Plant and Equipment)
103-660 (Quality of Service)
103-662 (Restrictions on Use of Service)
103-663 and all subparts (Service Standards)
103-670 (Acceptable Standards)
103-671 (Protective Measures)
103-672 (Safety Program)
103-680 (Role of the Advisory Committee)
103-681 (Committee Name)
103-682 (Composition of the TRS Advisory Committee)
103-683 (Meetings)
103-684 (Commission Approval)

**ATTACHMENT B TO BELL SOUTH'S LETTER
DATED DECEMBER 1, 2005**

BellSouth stands by the collaborative suggestions and urges the Commission to adopt the collaborative suggestions in total for the rules set forth below. Unless otherwise noted, the Rule Numbers are those that appear in the Commission's proposed changes.

- 103-601 (Application of Rules)
- Need to add definition of Written or In Writing (Collaborative Proposed 103-602.12)
- 103-602.1 (Definition of 900 Numbers needs to be 900 Services)
- 103-602.5 (delete definition of Information Provider)
- 103-604 (Territory and Certificated Area)
- 103-605 (Utility Rules and Regulations)
- 103-612 (Data to be Filed with the Commission and provided to the ORS)
- 103-613 (Inspection of Telephone Utility Plant)
- 103-614 (Interruption of Service)
- 103-618 (Service Reports)
- 103-620 (Customer Information)
- 103-621 (Customer Deposits)
- 103-621.1 (Deposit Receipt)
- 103-621.3 (Interest on Deposits)
- 103-621.5 (Deposit Retention)
- 103-621.6 (Unclaimed Deposits)
- 103-622.3 (Disconnection and Reconnection)
- 103-624 (Application for Service)
- 103-624.2 (Obligation)
- 103-626 (Insufficient Reasons for Denying Service)
- 103-628.1 (Written Complaints)(we prefer the Collaborative Proposed 103-616.1)
- 103-628.2 (Oral Complaints)(we prefer deleting this)
- 103-629 (Tariffs, Rules, and Regulations)
- 103-631 and all subparts (Directories)
- 103-632 and all sub-parts (900 & 900-Type Services Offerings)
- 103-644 (Inspection of Plant)
- 103-651 (ORS Inspection and Test)
- 103-653 (Trouble Reports)
- 103-661 (Interruptions of Service)